

Exhibit A

**MAJOR LEAGUE
BASEBALL PLAYERS ASSOCIATION**

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August 4, 2020

VIA E-MAIL

Adam J. Kaiser
Alston & Bird LLP
90 Park Avenue
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Howard J. Kaplan
Kaplan Rice LLP
142 West 57th Street, Suite 4A
New York, New York 10019
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Dear Mr. Kaiser and Mr. Kaplan,

I am writing to follow-up on our conversations related to your attachment of arbitration awards issued under the Major League Baseball Players Association's arbitration system as exhibits to your filings in both the Southern District of New York and the Supreme Court of New York. In your respective public filings you have attached the following arbitration awards: *Legacy Agency v Scoffield*, *Beverly Hills Sports Council v. Mato*, *Legacy Agency v. Praver Shapiro Sports Management*, and *ACES v Borkin*. As we have discussed, the Major League Baseball Players Association ("MLBPA") considers these decisions to be confidential and orders the parties to immediately ask the Court to withdraw the public filings and to refile the decisions under seal.

As you are aware, Section 7(A)(18) of the MLBPA's Regulations Governing Player Agents ("Agent regulations") states that, "Arbitration proceedings pursuant to this Section 7(A) are confidential, except to the extent that disclosure of any aspect of the proceedings (e.g., the grievance, answer, reply, briefs or other filings, hearing transcript, exhibits, etc.) is necessary, in the judgment of the MLBPA, for the effective administration of these Regulations or the effective representation of Players." Section 5(B)(14) of the Agent Regulations prohibits the unauthorized disclosure of "...any information expressly designated as confidential by the MLBPA...." Confidentiality is a core feature of the MLBPA's arbitration system. As described in Section 7 of the Agent Regulations, the MLBPA's arbitration system "is intended and designed to ensure that all disputes -- which involve

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essentially internal matters concerning the relationships and dealings among individual Players, Player Agents,... Agencies and affiliated persons or entities, and the MLBPA in its capacity as the exclusive bargaining representative for the Players -- are handled expeditiously and privately..."

The public filing of MLBPA arbitration awards does immense damage to the confidentiality of the proceedings of the decisions you attached, as well as the separate disputes cited in those arbitrations awards and the arbitration system in general. In particular, the grievants and witnesses in *Beverly Hills Sports Council v. Mato*, *The Legacy Agency v. Praver Shapiro Sports Management*, and *ACES v Borkin* are innocent third parties who have no interest in having their private matters made public as part of your dispute.

For all these reasons, the MLBPA orders The Legacy Agency, Inc. and Brodie Scoffield to immediately request to withdraw the public filings of these the MLBPA's confidential arbitration decisions in both Federal and State court and to refile these decisions under seal. In addition, any portions of your filings that cite or quote any of the MLBPA's confidential arbitration decisions should also be placed under seal and replaced with public versions of those documents which redact all references and citations to confidential MLBPA arbitrations. The MLBPA understands that counsel for Mr. Scoffield has already begun this process and that counsel for Legacy has agreed to do the same. The MLBPA appreciates your commitment to expeditiously resolving this issue.

Sincerely,

A handwritten signature in cursive script that reads "Robert M. Guerra".

Robert M. Guerra
Assistant General Counsel
Major League Baseball Players Association